



ON-THE-JOB TRAINING:

GENERAL INFORMATION

The Department of Veterans Affairs On-The-Job Training Program (OJT) provides eligible veterans with the opportunity to obtain training and practical job experience concurrently. Veterans who are entitled to training under the Chapter 31 VA Vocational Rehabilitation Program are eligible to participate in an OJT program when determined appropriate by a VA Case Manager. This program is ideal for eligible veterans who learn easily in a hands-on environment. After placement in an OJT program, a Case Manager/Employment Specialist will closely monitor the veteran's progress to ensure that all training goals are being met. Since veterans who participate in OJT programs are employed by the participating employers from the start, employment is expected to continue after the training program has ended. Therefore, another very important part of the Case Manager/Employment Specialist's role involves assuring that the employer is satisfied with the veteran's progress and performance in order to facilitate job retention at the conclusion of the OJT placement.

The initial challenge in setting up an OJT is developing a suitable placement for the veteran. This phase is much like traditional job development. The Case Manager will need to focus on identifying prospective employers with hiring needs and educating the employer regarding the benefits of hiring veterans for on-the-job training positions.

ADVANTAGES TO THE EMPLOYER

- Hiring qualified veterans and qualifying for tax incentives
- Ability to hire a trainee at an apprenticeship wage
- Trainee is provided with necessary tools, uniforms and other required supplies
- Minimal paperwork is required of the employer
- Employer has VA support during training and placement follow-up phase to assist with any work or training related problems

BENEFITS FOR VETERANS

- Immediate income and benefits as an employee vs. trainee
- Valuable skills are learned in a practical setting
- Salary is supplemented via VA Chapter 31 subsistence, so veterans receive journeyman wage from the start (up to the maximum allowed for OJT training)
- Permanent employment almost certain after training, at journeyman's wage
- Relationship with Case Manager to assist with any training or work related problems

CODE OF FEDERAL REGULATIONS AND M28-1

The Code of Federal Regulations (CFR) outlines the requirements for setting up OJT programs. M28-1 is the manual which outlines the procedure. The manual reference for OJT is M28-1, Part III. The CFR references for OJT are listed below:

CFR 21.120 through CFR 21.162 (applicable sections only)

CFR 21.290 through CFR 21.299 (applicable sections only)

SETTING UP AN OJT PROGRAM

There are several steps involved in setting up an OJT program. Those steps are:

- (1) Establish a career goal
- (2) Select a site
- (3) Visit site to determine if it meets necessary criteria
- (4) Complete appropriate paperwork
- (5) Obtain final approval

ESTABLISHING A CAREER GOAL

Initially, a career goal must be identified by the veteran and his or her counselor that is consistent with the veteran's interests, aptitudes and abilities and will not aggravate the veteran's disability conditions.

The contract counselor will obtain concurrence with the VA Counselor before proceeding to the next step of selecting a site. During the concurrence process, the VA Counselor will determine whether he/she will work with the Employment Specialist and/or DVOP, in order to identify an employer with whom an OJT will be established.

SELECTING THE SITE

The Case Manager/Employment Specialist's role in selecting the site is to market the eligible veteran, explaining all of the advantages of the OJT program to prospective employers. It is also important that the Case Manager/Employment Specialist explain the VA's role in follow-up and the employer's responsibilities in providing training goals and feedback to the VA. Once an employer is identified that is a match for the veteran in terms of training needs, the Case Manager will assist the employer in scheduling an interview with the veteran to assure that the veteran meets the employer's hiring criteria.

DETERMINING THAT THE SITE MEETS VA CRITERIA

After the employer has agreed to participate in the program by hiring the veteran, the VA Case Manager/Employment Specialist will begin by conducting a site survey to determine that the employer meets the CFR criteria as a training site. Once the site has been approved by the VA Case Manager/Employment Specialist, the Case Manager/Employment Specialist will proceed to obtain a training outline from the employer and find out if there are any tools, equipment, uniforms and/or supplies required of all employees that the veteran will need prior to entrancing training. Appropriate paperwork will need to be completed by the Case Manager. A detailed description of the necessary documentation is given under the next section heading.

Case Managers/Employment Specialists should allow at least two weeks lead time between commitment from employer to veteran's start date. This will allow for adequate time to complete all needed paperwork and obtain approval. This timeframe should be explained to the employer to avoid misunderstandings. The VA paperwork required as a part of the establishment of an OJT placement is as follows:

1. *Site Survey:* The counselor must physically visit the site and conduct a site survey to determine if the site meets the requirements of CFR 21.290, 292, 294, and 296 for course approval and selecting the training or rehabilitation facility. The results of this visit will be documented on a VA Form 119, Report of Contact. The Site Survey report must address all of the issues outlined in CFR 21.294 and reference to the CFRs must be made. The completed survey will be forwarded for approval by the VR&E Officer. Once this approval has been obtained, the Case Manager/Employment Specialist will obtain a facility code.
2. ***Designation of Certifying Officials:*** The employer will sign VA Form 22-8794, Designation of Certifying Officials. On the form, the employer lists staff who he/she authorizes to sign any documents relating to the

OJT program. If no additional staff are identified on the form, then this employer contact will be the only person authorized to sign these documents.

3. ***Equal Opportunity:*** The employer will sign VA Form 27-8206, Veterans Administration Statement of Assurance of Compliance with Equal Opportunity Laws.
4. ***Job Objectives:*** The employer, with assistance from the Case Manager/Employment Specialist, must identify specific job objectives for the veteran to accomplish during the program. The employer will need to indicate the length of time it should take the veteran to accomplish each objective. This will be written directly on the VA Form 28-1904, Agreement to Train On-The-Job Disabled Veteran's under the appropriate headings. The employer must sign the form where indicated. It should be noted that although the heading for length of time on the form indicates "length in months," the employer may choose to identify more discreet time frames such as days or weeks for each objective. If using days or weeks for the length of each objective, simply draw a line through the word "months" on the form, and write "days" or "weeks."
5. ***Wage Schedule:*** The employer must document the wage schedule to be paid to the veteran while in the program, and must specify the journeyman wage for the job. The veteran's wages should gradually increase as he/she completes specified objectives.

Example:

Journeyman salary = \$2000/month,
Duration of OJT = 12 months,

wages for first 4 months = \$1200/month
wages next 4 months = \$1500/month
wages last 4 months = \$1800/month
wages at end of program = \$2000/month

This information must be provided by the employer on company letterhead, and must be signed by the employer. It is important to note that even during the initial training phase, the training wage may not be less than minimum wage.

6. ***Supplies:*** The Case Manager/Employment Specialist will need to discuss with the employer any tools, uniforms and/or supplies that are required of all journeymen employees on the job. This will NOT include tools that are normally owned by the employer. Uniforms that are normally rented will be rented as opposed to purchased. Tools and

supplies that are normally required to be owned by the employee will be purchased by VA Chapter 31 for the veteran, and will remain the property of the veteran even if he/she leaves the employment. However, in some instances, VA may recoup tools and equipment supplied to the veteran if the veteran drops out of the program.

If tools and/or supplies will need to be purchased, a VA Form 28-1905m, Request for Supplies, will be completed and signed by the employer, the veteran and the VA Counseling Psychologist (CP) or Vocational Rehabilitation Counselor (VRC). In most circumstances, the Case Manager/Employment Specialist will need to obtain 3 bids for the items to ensure fair pricing. Bids should be documented appropriately as shown in the sample provided in this packet.

If the total order for supplies is under \$2500.00 and the selected vendor accepts VISA cards, the VA, CP, or VRC may purchase the items using the IMPAC VISA card. The vendor must understand that the purchase is tax exempt, and all items must be in stock.

OR

If the total order for supplies is under \$2500.00 and the selected vendor does not take VISA cards but does take purchase orders, a VA Form 90-2138, Order for Supplies or Services will need to be completed and signed by the VR&E Contracting Officer.

OR

If the total order for supplies is over \$2500.00 and the vendor accepts purchase orders, then a VA Form 2237, Request, Turn-In and Receipt for Property or Services, will need to be completed and signed by the VR&E Officer.

APPROVAL OF THE OJT PLACEMENT

The complete CER file, with all above information appropriately filed, will be presented to the VR&E Officer for approval. The IWRP and the VA Form 28-1904 will be flash filed in the CER, right flap. All other documentation will be filed down below these items. The VR&E Officer will sign the VA Form 28-1904, Agreement to Train, indicating approval.

FINAL PREPARATION STEPS

In order to avoid delays in the veteran's program, the Case Manager who established the OJT placement will complete the following documents before transferring the case to a Case Manager.

1. *Facility Code:* The Case Manager/Employment Specialist will assure that the facility code is documented in the CER file.
2. *Authorization and Certification:* The Case Manager/Employment Specialist will complete VA Form 28-1905, Authorization and Certification of Entrance or Reentrance into Rehabilitation and Certification of Status. The original must be signed by a VA Case Manager/Employment Specialist and will then be filed in the CER File, left flap. One copy of the original should be provided to the employer with an explanation on how to complete the certification, and a copy should be provided to the veteran.

CASE MANAGEMENT

It is important for the Case Manager/Employment Specialist to maintain continuous supervision while a veteran is involved in an OJT program in order to ensure success. Monthly supervisions are recommended, however, the frequency of supervisions should be determined by the Case Manager/Employment Specialist based upon the veteran's specific needs. Supervisions will take place at the OJT site. The Case Manager/Employment Specialist should also meet with the veteran's OJT supervisor to determine the veteran's progress in training as well as assist with any problems. Immediate interventions by the Case Manager/Employment Specialist must occur if problems arise.

CERTIFICATION

When the veteran's case is referred to a Case Manager/Employment Specialist, the Case Manager/Employment Specialist should determine, by looking in the CER file, whether or not the certification has been obtained from the employer. If it has not been received, the Case Manager/Employment Specialist will need to follow up with the employer to obtain the certification as soon as possible. The certification is required to be a permanent part of the record within 15 days of the commencement of training.

EDUCATION AWARD

The Case Manager/Employment Specialist will process the award by completing VA Internal Award Worksheet. The award must be processed within 14 days of the first day of training. The Case Manager/Employment Specialist will be responsible for updating this award if unexpected changes occur with the veteran's wages or attendance (e.g., excessive absences). The Case Manager/Employment Specialist will also be responsible for obtaining a VA Form 1999b when any change in status occurs, such as decreased training time or change in training wage. It will be necessary for the Case Manager/Employment Specialist to assist the employer in this process as most employers will have minimal experience in working with the VA or completing VA forms.

MONTHLY RECORD OF TRAINING

The employer will need to complete the VA Form 28-1905c, Monthly Record of Training and Wages on a monthly basis. Both the employer and the veteran sign the form. The Case Manager/Employment Specialist must obtain this completed form from the employer every month, within 10 days of the first of the month. The record will reflect the veteran's attendance and progress for the previous month. The veteran is provided with a copy of the form for his/her records (the 28-1905c is printed in duplicate). This record will be reviewed by the Case Manager/Employment Specialist will discuss ratings with the veteran and the trainer, particularly focusing on improving low ratings and assisting in problem identification and resolution.

CASE MANAGEMENT REPORTS

The Case Manager/Employment Specialist will document all site supervisions and telephone contact with the veteran on a VA Form 29-1905, Special Report of Training. Contacts with the employer or any other persons on behalf of the veteran will be documented on VA Form 119, Report of Contact.

FOLLOW UP

When the veteran's training period has ended, the Case Manager/Employment Specialist will need to confirm with the employer that the veteran has reached his/her final goals. The Case Manager may authorize Placement Follow-up services for 60-90 days to ensure stability of the placement. When the placement is determined by the Case Manager/Employment Specialist to be stable, the veteran will be moved to rehabilitated status. If placement is not determined stable, the Case Manager/Employment Specialist who is conducting the follow-up services will expedite staffing with the Case Manager/Employment Specialist to discuss interventions or services needed to assist the veteran in being successfully rehabilitated.

EMPLOYMENT ADJUSTMENT ALLOWANCE

The Case Manager/Employment Specialist will process the veteran's Employment Adjustment Allowance (EAA) using VA Internal Award Worksheet. The Case Manager/Employment Specialist will verify with the employer that the veteran completed training. Since the veteran is employed, the full two month EAA will be processed, commencing the first day after training was completed. The EAA is paid at the full time subsistence rate.